

BellSouth Telecommunications, Inc.

333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

joelle.phillips@bellsouth.com

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OFFICE OF
EXECUTIVE SECRETARY

Joelle J. Phillips
Attorney

615-214-6311
Fax 615-214-7406

February 19, 2002

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *Petition of MCI WorldCom to Enforce Interconnection Agreement with BellSouth Telecommunications, Inc.*
Docket No. 01-00513

Dear Mr. Waddell:

BellSouth is in receipt of the Staff Data Requests dated February 11, 2002 in the above-referenced docket. After reviewing the Data Requests, BellSouth personnel had questions concerning which they believed additional clarification or information was needed in order to adequately respond to the Data Requests. BellSouth communicated these concerns to the Hearing Officer and to counsel for MCI. BellSouth was directed by the Hearing Officer to provide a written request for clarification or further information regarding the Data Requests to the Hearing Officer along with a formal request for additional time, if necessary, arising out of this clarification.

BellSouth is prepared to respond to Data Requests 1 and 4 by the February 25th deadline established by the Data Requests without any clarification.

With respect to the Data Requests 2, 3, 5 and 6, BellSouth respectfully requests an extension of time in which to respond to those Data Requests, such extension to provide BellSouth with 15 days following receipt of the Hearing Officer's response to BellSouth's request for further information and clarification. BellSouth has the following questions and concerns regarding the four referenced Data Requests.

Data Requests 2, 3, 5 and 6 reference the provision of information with a complete 10 digit telephone number (NPA/NXX/XXXX). As addressed by testimony in this docket, call records with this 10 digit level of detail are recorded in the form of AMA data by the switch.

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This "raw AMA data" from the central office switch is only retained by BellSouth for 60 business days. BellSouth has only limited extract capabilities for this data, allowing only access and printing of specific records to review the output fields. Moreover, BellSouth has only limited extract capabilities for sorting the data and has no capabilities to sum the data in the manner requested. In addition, the full originating Telephone Number is not generally known. As an example, incoming calls received by BellSouth over access trunks may not contain all Telephone Number (TN) information and for calls coming over local trunks, the TN information is generally limited to the NPA-NXX followed by zeros. Accordingly, sorting this information from the raw AMA data would be a manual effort at best requiring literally thousands of hours as well as the designing of computer software to actually sort the information in the fashion requested by the TRA.

BellSouth's purpose in retaining the raw AMA data is to check one or two such call details at a time. Even that process is quite time consuming and rarely utilized. BellSouth currently has no computer software designed to sort the raw AMA data to provide information in the form requested by the TRA. Rather, as addressed in testimony in this docket, BellSouth uses summaries, which do not contain the complete 10 digit number but rather are based on the six digit NPA/NXX. BellSouth is confident in the reliability of these summaries. To the extent that the Data Requests are intended to look beyond those summaries and elicit the actual underlying 10 digit numbers for purposes of validating the summary, BellSouth believes that can be accomplished by performing a traffic study that would collect data for a one-day period that could be compared to the summary data for that same one-day period. A study of this type would collect all call detail records, including, originating number NPA/NXX/XXXX, LRNs (Location Routing Numbers), the terminating NPA/NXX/XXXX, call connect time, and call duration.

By using the one day study, the TRA could determine whether the summary information provided by BellSouth was reliable without requiring the parties to expend a substantial amount of time and incur the dramatic expense related to capturing 10 digit based data from the raw AMA data. BellSouth proposes that it answer the Data Requests using the summary data and also would be willing to provide a one-day study if necessary to support the validity of the summary data.

With respect to Data Request No. 3, BellSouth is confused by the wording of that Data Request. It appears from the plain language of the Request that the Authority is asking for information regarding MCI-originated intrastate traffic that terminates to BellSouth. If that is the intent of the Data Request, then BellSouth has the following problems supplying the information. First this data is stored in a standard CABS database, and BellSouth has no existing extract capabilities for this data. In addition, the data contained in the CABS database does not include BellSouth originated calls, just CLEC originated or IXC calls, nor does it include TN

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information, the date of the call, or the county. Accordingly, BellSouth lacks a method to identify, within the CABS database, the information sought by the Data Requests. One additional problem is that these CABS summaries are identified by interstate, intrastate and local, but that designation is made using the PIU and PLU factors provided by MCI.

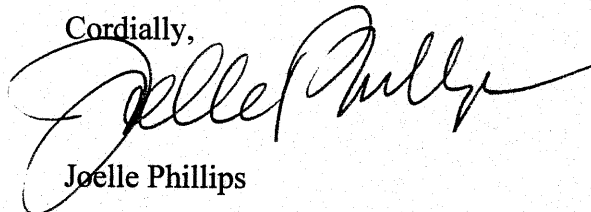
If, instead, Data Request No. 3 is intended to elicit information regarding BST-originating (not MCI-originating) intraLATA traffic, then BellSouth can compile the information using the AMA summary information described above. With respect to complete 10 digit numbers, the same issue described above is presented.

Regarding Data Request No. 5, BellSouth also needs clarification on the intent of the Data Request. The Data Request as presented seeks telephone numbers of BellSouth's end users subscribing to an extended optional calling plan "that terminate to a Brooks Fiber terminating NPA/NXX." BellSouth's confusion arises from the fact that any call from any telephone number could terminate to any NPA/NXX. BellSouth believes it is likely that the Data Request intends to elicit a list of telephone numbers of BellSouth's end users subscribing to an extended optional calling plan, which plan treats as local calls terminating to a Brooks Fiber NPA/NXX. Operating on the presumption that this is what the Data Request intends, BellSouth could only provide such information on a one-day "snapshot" basis for the last Friday of the previous month.

With respect to Data Request No. 6, BellSouth faces same problems identified for Data Request No 2 and 5 above concerning 10 digit numbers.

BellSouth respectfully requests that the TRA staff provide additional clarification concerning the information sought and consider the alternative of using a one-day traffic study rather than requiring the provision of 10 digit data in response to the requests. As noted above, BellSouth will respond to Data Requests 1 and 4 by the February 25 deadline. With respect to the remaining requests, BellSouth respectfully requests that it be given 15 days to respond after receiving clarification.

Cordially,

A handwritten signature in black ink, appearing to read "Joelle Phillips", written over the typed name.

Joelle Phillips

JP/jej

cc: Henry Walker, Esquire